

The Honorable Marsha J. Pechman

UNITED STATES DISTRICT COURT

WESTERN DISTRICT OF WASHINGTON AT SEATTLE

JULIE DALESSIO, an individual,

Case No. 2:17-cv-00642 MJP

Plaintiff,

Plaintiff's Fourth Interrogatories and
Requests for Production to Defendant,
UW

v.

UNIVERSITY OF WASHINGTON,

November 13, 2017

Defendant.

Pursuant to Federal Rules of Civil Procedure (FRCP), Plaintiff gives notice of incomplete responses and disclosures and requests that Defendant supplement insufficient responses.¹ ***THIS IS ALSO A REQUEST FOR PRODUCTION, PURSUANT TO CIVIL RULE 34.***

¹Rule 26(e) SUPPLEMENTING DISCLOSURES AND RESPONSES.

(1) In General. A party who has made a disclosure under Rule 26(a)—or who has responded to an interrogatory, request for production, or request for admission—must supplement or correct its disclosure or response:

(A) in a timely manner if the party learns that in some material respect the disclosure or response is incomplete or incorrect, and if the additional or corrective information has not otherwise been made known to the other parties during the discovery process or in writing;

I. REQUEST FOR SUPPLEMENTAL RESPONSES TO PREVIOUS INTERROGATORIES

A. The Defendant's identification of the following 21 individuals that have been disclosed is incomplete.

Plaintiff requests that defendant please complete previous disclosures to include the person's title and employment classification, present business address and telephone number, all known email addresses, **his or her present employment position and location, and his or her employment position and location at the time in question.** For those who are no longer employed by UW, please also provide his or her residence address.

Plaintiff has attempted to fill in previously disclosed information, and highlighted deficiencies.

1. Alison Swenson, TITLE: Classification: Time in that Position:
present employment position and location, and employment position and location at the time in question.
c/o Keating, Bucklin & McCormack, Inc.

2. Perry Tapper

Public Records Compliance Officer Classification: Time in that Position:
present employment position and location and employment position and location at the time in question.
c/o Keating, Bucklin & McCormack, Inc

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2 3. Eliza Saunders

3 Director of the Office of Public Records Classification: Time in that Position:
4 present employment position and location and employment position and location at the
5 time in question.

6 Office of Public Records and Open Public Meetings

7 c/o Keating, Bucklin & McCormack, Inc

8 4. Barb Benson TITLE: Classification: Time in that Position:

9 present employment position and location and employment position and location at the
10 time in question.

11 Records Management Services

12 c/o Keating, Bucklin & McCormack, Inc.

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14 5. Andrew Palmer TITLE: Classification: Time in that Position:

15 present employment position and location and employment position and location at the
16 time in question.

17 c/o Keating, Bucklin & McCormack, Inc., P.S.

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19 6. Lori Oliver TITLE: Classification: Time in that Position:

20 present employment position and location and employment position and location at the
21 time in question.

22 c/o Keating, Bucklin & McCormack, Inc., P.S.

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3 7. Mindy Kornberg TITLE: Classification: Time in that Position:

4 present employment position and location and employment position and location at the
5 time in question.

6 c/o Keating, Bucklin & McCormack, Inc.

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8 8. Cynthia Dold TITLE: Classification: Time in that Position:

9 present employment position and location and employment position and location at the
10 time in question.

11 c/o Keating, Bucklin & McCormack, Inc.

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13 9. Ana Marie Keeney, Human Resources Consultant, UW Medicine Human Resources

14 Classification: Time in that Position:

15 present business address and telephone number, all known email addresses. present
16 employment position and location and employment position and location at the time in
17 question.

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19 10. Amy Robles, Public Records Program Manager, Legal and Business Affairs, UW

20 Medicine Classification: Time in that Position:

21 present business address and telephone number, all known email addresses

22 present employment position and location and employment position and location at the

1 time in question.
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5 11. Jeanie Miele, former Public Records Program Manager, Office of the Chief Health System

6 Officer, UW Medicine Classification: Time in that Position:

7 present business address and telephone number, all known email addresses

8 present employment position and location and employment position and location at the
9 time in question.
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11 12. Cheryl Manekia, UW Payroll Client Services & Training Classification:

12 Time in that Position:

13 present business address and telephone number, all known email addresses

14 present employment position and location and employment position and location at the
15 time in question.
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19 13. Odessah Visitacion, Assistant to the Assistant Vice President & Office Manager,

20 UW Medicine Human Resources. Classification: Time in that Position:

21 present employment position and location and employment position and location at the
22 time in question.

1 present business address and telephone number, all known email addresses

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4 14. Paola M. Quinones, former Assistant to the Vice President, VP Human Resources ?

5 Classification: Time in that Position: present employment position and
6 location and employment position and location at the time in question.

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8 present business address and telephone number, all known email addresses

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10 15. Matt Maria, Program Coordinator for Laboratory Medicine

11 Classification: Time in that Position: present employment position and
12 location and employment position and location at the time in question.

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14 present business address and telephone number, all known email addresses

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17 16. Tamara Schmautz TITLE: Classification:

18 Time in that Position: present employment position and location and employment
19 position and location at the time in question.

20 present business address and telephone number, all known email addresses

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2 17. Steven Durant TITLE: Classification:
3 Time in that Position: present employment position and location and
4 employment position and location at the time in question
5 present business address and telephone number, all known email addresses
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7 18. Larry Bell TITLE: Classification:
8 Time in that Position: present employment position and location and employment
9 position and location at the time in question
10 present business address and telephone number, all known email addresses
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12 19. Sharon Risley, former assistant to Plaintiff's former supervisor TITLE:
13 Classification: Time in that Position: present employment
14 position and location and employment position and location at the time in question
15 present business address and telephone number, all known email addresses
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18 20. Rhoda Ashley Morrow, Plaintiff's former supervisor TITLE:
19 Classification: Time in that Position: present employment
20 position and location and employment position and location at the time in question.
21 present business address and telephone number, all known email addresses, present
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residence address

21. Karen Holloway, Associate Administrator, Department of Laboratory Medicine

TITLE: Classification: Time in that Position:

present employment position and location and employment position and location at the time in question

c/o Keating, Bucklin & McCormack, Inc.

22. Patricia Van Velsir

TITLE: Classification:

Time in that Position: present employment position and location and employment position and location at the time in question present

business address and telephone number, all known email addresses

23. Cheryl Sternberg, TITLE:

Classification:

Time in that Position: present employment position and location and employment position and location at the time in question present business address and telephone number, all known email addresses

B. For each of the persons listed above, identify which, if any, have provided responses to which interrogatories and/or requests for production.

II. REQUESTS FOR PRODUCTION

1. Please produce the UW personnel file, including employee training records for each of the persons listed above.

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2. Please produce the organizational charts pertaining to each of the persons listed above.
3. Please produce all public records pertaining to the Plaintiff that were provided by UW to Ludmilla Barbacar and/or other employees of the Washington State Human Rights Commission.
4. Please produce all public records pertaining to the Plaintiff that were provided by UW to EEOC investigators.
5. Please produce all public records pertaining to the Plaintiff that were provided by UW to Shari Spung.
6. Please produce all public records pertaining to the Plaintiff that were provided by UW to any state or federal auditors.
7. Please produce Plaintiff's employee benefits file.

Dated: November 13, 2017

Signed: s/ julie dalessio

Julie Dalessio
1110 29th Ave.
Seattle, WA 98122

206 324 2590
juliedalessio@msn.com

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2 DECLARATION OF RESPONDING PARTY

3 I declare under the penalty of perjury under the laws of the State of Washington that I am the
4 Defendant in this action OR I am the _____ of

5 _____ and am authorized to make the foregoing answers.

6 I declare that I have read the foregoing answers, know the contents thereof, and believe them
7 to be true and correct.

8 Dated this _____ day of _____, 2017, at _____, Washington.

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11 Name:

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Address: